



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR-N

OCT 01 2009

Jamie Kingsbury, District Ranger
Medicine Bow National Forest
Hahns Peak/Bear Ears Ranger District
925 Weiss Drive
Steamboat Springs, CO 80487

Re: Willow Creek Pass Fuel Reduction
Draft EIS: CEQ #200090287

Dear Mr. Kingsbury:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the Willow Creek Pass Fuel Reduction on the Medicine Bow National Forest in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C 4231, and Section 309 of the Clean Air Act. The Hahns Peak/Bear Ears Ranger District proposes to construct a small amount of temporary road and perform hazard tree removal. The proposed activities would require entering the Dome Peak Inventoried Roadless Area adjacent to private properties to treat approximately 81 acres of conifers with high beetle mortality.

The DEIS provides a good narrative summary and adequately addresses environmental concerns. Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the proposed action presented in this DEIS as "LO" (Lack of Objection) under EPA's rating criteria. The rating means that our review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review did disclose opportunities for application of mitigation that could be accomplished with minor changes to the proposal. An explanation of the rating criteria is enclosed.

EPA believes the DEIS adequately sets forth the environmental impact(s) of the preferred alternative and the no action alternative. There are no surface water or groundwater concerns with the proposed action. The vegetation management and the temporary road construction are not planned near perennial streams. However, EPA suggests additional information regarding air quality potential impacts and mitigation.

The DEIS presents a discussion on the burning of slash piles from the timber harvesting (pg 26). We recommend strengthening this paragraph with a discussion on the

project's smoke impacts on the nearby subdivision and any Class I areas that may be affected. Also, additional discussion should be considered regarding:

- what smoke mitigation techniques will be used;
- the meteorological conditions favorable for the prescribed burns;
- alternatives to burning;
- any monitoring of smoke concentration levels;
- and public notification of pending burns.

Thank you for the opportunity to provide comments on the DEIS. If you have any questions or would like to discuss our comments, please contact me at (303-312-6004) or you may contact Sarah Hester of my staff at (303-312-6008).

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure: EPA's rating system criteria